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August 4, 2025

VIA ECF

The Honorable Renée M. Bumb, Chief U.S.D.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: ***NJDEP, et al. v E. I. Du Pont Nemours and Company, et al.***; Civil Action No. 2:19-cv-14758-RMB-JBC-JS (Pompton Lakes Works)

NJDEP, et al. v E. I. Du Pont Nemours and Company, et al.; Civil Action No. 1:19-cv-14765-RMB-JBC-JS (Repauno Works)

NJDEP, et al. v E. I. Du Pont Nemours and Company, et al.; Civil Action No. 1:19-cv-14766-RMB-JBC-JS (Chambers Works)

NJDEP, et al. v E. I. Du Pont Nemours and Company, et al.; Civil Action No. 3:19-cv-14767-RMB-JBC-JS (Parlin Site)

Dear Chief Judge Bumb:

On behalf of plaintiffs New Jersey Department of Environmental Protection ("DEP"), the Commissioner of DEP, and the Administrator of the New Jersey Spill Compensation Fund (collectively, "Plaintiffs"), and with the consent of defendants EIDP, Inc. (f/k/a E. I. du Pont de Nemours and Company), Corteva, Inc., DuPont de Nemours, Inc., DuPont Specialty Products USA, LLC, The Chemours Company, and The Chemours Company FC, LLC (collectively, "the Settling Defendants," and together with Plaintiffs, "the Parties"), we write to advise the Court that these Parties have agreed to a proposed settlement to resolve Plaintiffs' claims against Settling Defendants in the above-referenced matters.

Notice of the proposed settlement will be published in the *New Jersey Register* on September 2, 2025, and the proposed Judicial Consent Order ("JCO") will be published on DEP's website or otherwise made available for public review. Public comments on the JCO will be accepted by DEP for 60 days, after which time DEP will respond to the public's comments before filing a motion with the Court seeking approval of the JCO as published or in the form of a JCO that reflects a further agreement among the Parties following the public comment period.



Plaintiffs are seeking to file motions to approve their settlements with these Settling Defendants and 3M Company on a schedule that would allow for a hearing on those motions to be held before the conclusion of 2025. The Parties are working on a proposed scheduling order to that effect that will be submitted shortly for the Court's consideration.

Based on the above, the Parties request entry of the enclosed order staying all non-settlement related proceedings as to Settling Defendants in these matters, including trial in the Chambers Works action.

We thank the Court, its staff, and the Special Master for their extraordinary efforts in this matter. Counsel for the Parties are available to answer any questions that the Court may have.

Respectfully,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: *Gwen Farley*
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Deputy Attorney General

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By: *David M. Reap*
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cc: All Counsel